

Plan for Future Interactions on OQ

March 25, 2003

Preparation of OQ Supplementary Guidance

OPS intends to develop supplementary guidance for use by inspectors in evaluating operator OQ Programs. This guidance will be available on the OQ Web Site to industry and the public. To the degree reasonable, OPS intends to incorporate examples of practices used by operators in implementing their OQ programs that we believe satisfy the intent of the rule. These examples will not be requirements, but are intended to provide inspectors with examples of elements of effective programs.

OPS would highly value industry input on “criteria”, “benchmarks” and “noteworthy practices” used by operators to effectively implement their OQ Programs. Examples could include:

- Listings of covered tasks for each industry segment (e.g., liquid, gas transmission, gas distribution, master meters) together with recommended evaluation methods (KSA) and criteria on appropriate reevaluation intervals;
- Documentation presenting the basis (or justification) for recommended reevaluation intervals, including the positions of other regulatory agencies and the performance experience of relevant industries in similar tasks;
- Listings of documentation to be retained by operators to demonstrate compliance with provisions of the rules, and criteria on retention periods;
- Listings of generic and task-specific AOCs for consideration by operators in qualifying their people;
- Guidance for use by operators helping field supervisors decide on appropriate span of control in directing and observing non-qualified individuals in the performance of covered tasks;
- Guidance on tasks that should be performed only by qualified people;
- Acceptance criteria for small operators.

Discussion of these areas and others suggested by meeting participants would be useful to help regulators understand what future work products might be expected, and how we might participate in their development or review.

Input to Discussion on National Consensus Standard on Operator Qualification

- Need to identify federal and state participants,
- Need for clear and agreeable “ground rules” for decisions;
- Need for organizational “home” for standard.

Public Meeting in Atlanta, Week of April 21

- Discuss final protocols (these will be posted on the OQ web site in early April);

- As needed, discuss definitions (these will be posted on the OQ web site in early April);
- Discuss progress on development of input to supplementary guidance;
- Discuss revised FAQs for consistency with resolution of major issues (draft will be available prior to the meeting);

Regulatory Plans

- Complete Protocols and Definitions: April 4, 2003
- Begin Next Stage of OQ Inspections: April 7, 2003
- Complete Revision of FAQs: May 30, 2003
- Complete Supplementary Guidance: June 30, 2003
- Complete Computer-Based Training for OQ Inspectors: August 30, 2003
- Complete National Consensus Standard: June 30, 2004